

10-013927



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March 31, 2010

The Honorable Gary Locke  
 Secretary of Commerce  
 U.S. Department of Commerce  
 1401 Constitution Ave, N.W.  
 Washington, DC 20230

EXECUTIVE SECRETARIAT  
 NOME APR - 8 AM 9:45

Dear Secretary Locke:

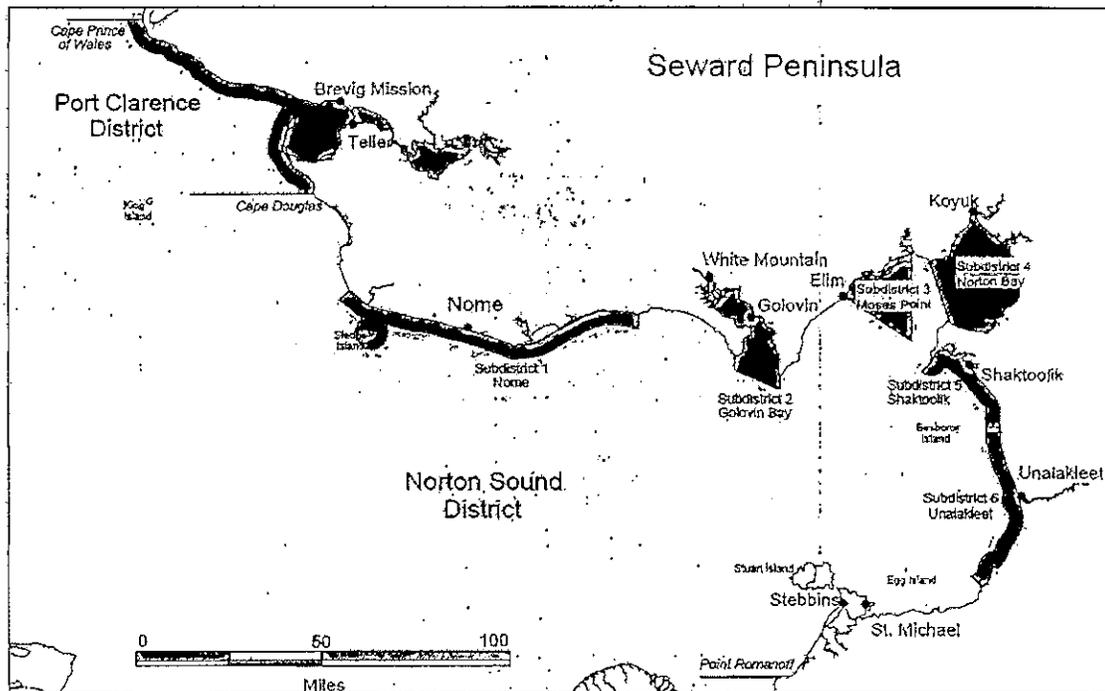
On behalf of the federally recognized tribes in the Bering Strait Region, we are requesting your office to expand the commercial fishery disaster declaration for the Yukon River Chinook salmon to include Chinook and chum salmon stocks in the Norton Sound and Port Clarence Districts. These districts lie just north of the Yukon River mouth, and our commercial and subsistence fishermen have been similarly impacted by very poor salmon returns resulting in severe hardship and economic loss for our region.

The Norton Sound and Port Clarence Districts have seen declining salmon runs in recent years, and 2009 proved to be one of the worst years on record. Commercial fishermen in Norton Sound faced severe restrictions and closures that have resulted in substantial loss of income and revenues, and the collapse of the sockeye salmon run in the Port Clarence District resulted in a complete closure to commercial fishing in this area. In 2009, the State of Alaska again restricted subsistence harvests in the Nome Subdistrict and Port Clarence District, and this caused additional hardships for thousands of rural residents who depend upon subsistence fisheries to feed their families during the long winters.

Commercial fishing for Chinook salmon was completely closed again in the Unalakeet and Shaktoolik Subdistricts of Norton Sound, and this once-productive fishery has only had one opening since 2001. Commercial fishermen lost additional revenue due to restrictions placed on other salmon fisheries in order to conserve Chinook salmon. Fifteen percent fewer commercial permit holders fished salmon in the Unalakeet Subdistrict than in 2008. Subsistence fishermen in Unalakeet took the extraordinary measure of requesting that the upper Unalakeet River be closed to subsistence fishing during July in order to conserve spawning Chinook salmon. Chinook salmon in both subdistricts were designated as a stock of yield concern in 2004 and this designation was continued by the Alaska Board of Fisheries in 2007. During 2008, these subdistricts had the lowest Chinook salmon escapement recorded since 1984.

Poor runs of chum salmon to northern Norton Sound have kept Golovin Bay and Moses Point Subdistricts closed to pink and chum salmon commercial fishing by regulation. The state also delayed opening the commercial fishery for coho salmon in these subdistricts to protect dwindling chum salmon populations. During the 2009 season, chum salmon runs in both the Niukluk and Kwiniuk Rivers failed to meet escapement goals established by the state.

Chum salmon are designated as a stock of yield concern throughout the Nome Subdistrict. In 2009, the Nome Subdistrict had one of the worst chum salmon runs on record, and no commercial chum salmon fishing has been allowed in this area for a generation. Additionally, no other commercial salmon fisheries were allowed during 2009. Since the collapse of chum salmon stocks in Norton Sound in 1999, subsistence users have faced the most severe restrictions of anywhere in Alaska. Subsistence users in Nome narrowly avoided Tier II restrictions in 2009 and had a brief subsistence chum salmon fishery, but it may have been premature since the chum salmon runs in the Eldorado, Nome and Snake Rivers ultimately failed to reach the lower end of the escapement goal range. Nome residents once enjoyed plentiful salmon fishing in local rivers, but today an entire generation of Alaskans has missed out on this essential activity.



Map of Norton Sound and Port Clarence Districts in Western Alaska.

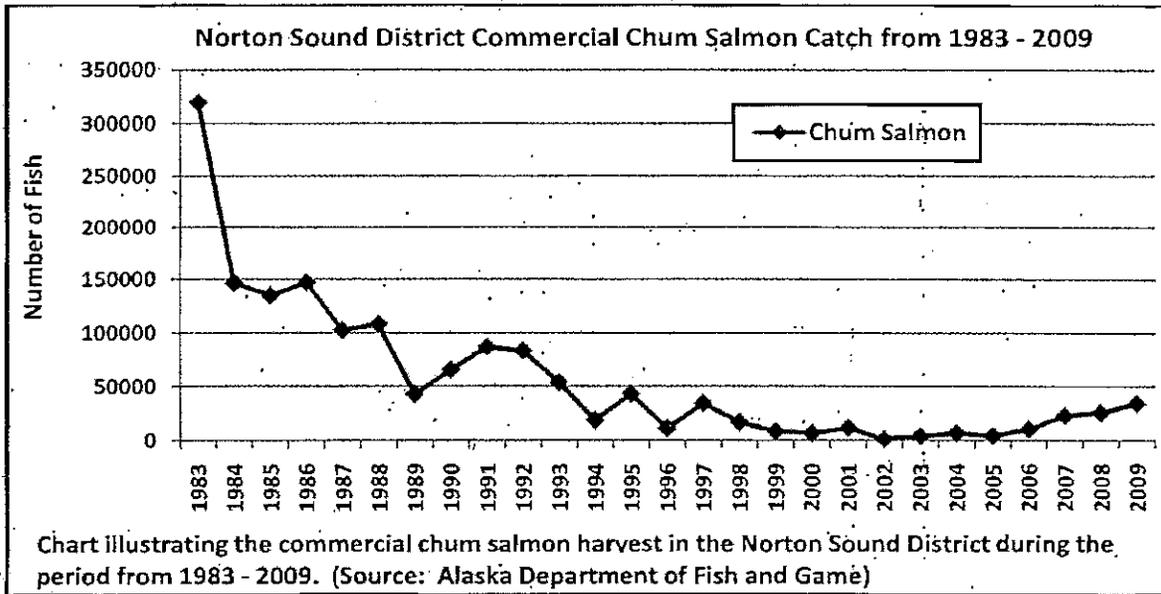
In Port Clarence District, there was no commercial salmon fishery because of the collapse of the sockeye salmon run, a stark contrast from the record runs of 2003 through 2007. Only 953 sockeye salmon were enumerated through the Pilgrim River weir in 2009, which was well short of the required 30,000 sockeye salmon in-river goal for Pilgrim River to allow for commercial fishing. Counts of all salmon species were the lowest on record since the weir has been in operation, and the collapse of these runs has created hardships for both commercial and subsistence users.



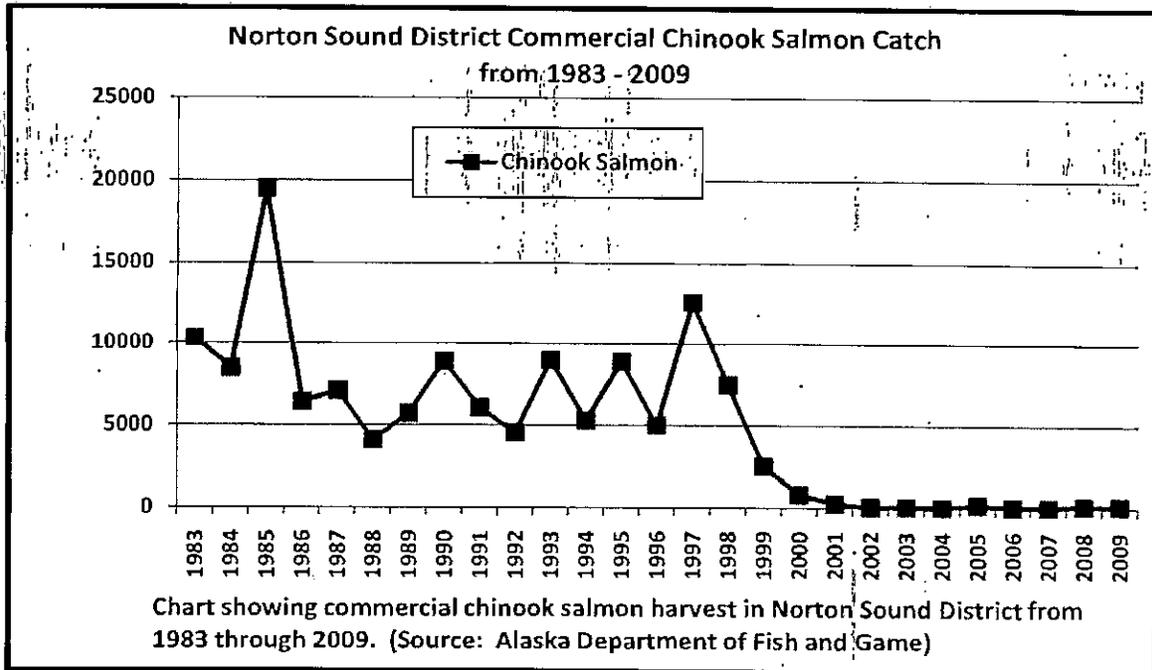
A fish drying rack sits empty after an unproductive season.



A photo from an earlier year, illustrates how a fish rack looks after a good harvest.



The residents of Norton Sound and Port Clarence Districts have suffered deeply from poor salmon returns which have resulted in the loss of employment, economic opportunity, traditional subsistence activities and Native Alaskan culture. Native Alaskans have a culture of salmon and subsistence which has successfully prevailed for thousands of years. It is unknown why our region's salmon populations have declined so dramatically, as there are many natural and man-made factors affecting it. Alaska's federally-managed pollock fishery continues to take substantial amounts of Chinook and chum salmon bound for Western Alaska rivers, and climate change may also play an important role. The extent that these factors affect our salmon populations is currently poorly understood, and more research is needed to better understand these natural and man-made processes.



We respectfully request your office to expand the determination of "Fishery Failure" for Yukon River Chinook salmon to include Chinook and chum salmon in the Norton Sound and Port Clarence Districts under Section 312(a) of the Magnuson-Stevens Act. The failure of our region's Chinook and chum salmon fisheries has been largely overshadowed by the larger fisheries failure on the Yukon River, but residents of the Bering Strait region are facing similar struggles and hardships.

Sincerely,

KAWERAK INCORPORATED

Loretta Bullard  
President

cc: Governor Parnell, Senator Murkowski, Senator Begich, Congressman Young